

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X **NOTICE OF REMOVAL**

SUBHANA RAHIM,

Plaintiff,

DOCKET NO.: 14-cv-5918

-against-

BUNZL USA, INC., PENSKE LEASING, INC. and
TORMAINO J. STEVENS,

Defendants.

-----X

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Defendants BUNZL DISTRIBUTION USA, INC. s/h/a BUNZL USA, INC., PENSKE TRUCK LEASING CO., L.P. s/h/a PENSKE LEASING, INC. and TORMAINO J. STEVENS hereby files this Notice of Removal of the above-described action to the United States District Court for the Eastern District of New York from the New York State Supreme Court, County of Kings, where the action is now pending as provided by Title 28, U.S. Code, Chapter 89 and states:

1. BUNZL DISTRIBUTION USA, INC. s/h/a BUNZL USA, INC., PENSKE TRUCK LEASING CO., L.P. s/h/a PENSKE LEASING, INC. and TORMAINO J. STEVENS are the DEFENDANTS in the above entitled action.
2. The above entitled action was commenced in the Supreme Court, County of Kings, State of New York and is now pending in that court. A copy of the plaintiff's complaint setting forth the claim for relief upon which the action is based was first received by the DEFENDANTS on October 3, 2014.
3. The action is a civil action for personal injuries as a result of an alleged motor vehicle accident and the United States District Court for the Eastern District of New York has jurisdiction by reason of the diversity of citizenship of the parties.
4. Plaintiff is now and at the time the state action was commenced a citizen of the State of New York and Defendants Bunzl USA, Inc. is now and at the time the state action was commenced a citizen of the State of Missouri. Penske Leasing, Inc. is now and at the time the state action was commenced a citizen of the State of Delaware. Tormaino J. Stevens is now and at the time the state action was commenced a citizen of the State of New Jersey. The matter in controversy allegedly exceeds, exclusive of costs and disbursements, the sum or value of \$150,000. No change of citizenship of parties has occurred since the commencement of the action. None of the Defendants are a citizen of the state in which the action was brought.
5. A copy of all process, pleadings, and orders served upon Defendants is filed with this notice.

6. Defendant will give written notice of the filing of this notice as required by 28 U.S.C.A. § 1446(d).

7. A copy of this notice will be filed with the clerk of the Supreme Court, County of Kings, as required by 28 U.S.C. § 1446(d).

Dated: New York, New York
October 8, 2014

SHAFFER GLAZER, LLP
Attorneys for Bunzl USA, Inc., Penske Leasing,
Inc. and Tormaino J. Stevens

By: s/_____
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TO:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Removal and Rule 7.1 Statement were mailed by first class mail, postage prepaid this October 8, 2014, to all counsel of record as indicated on the service list below.

s/

DAVID A. GLAZER (DG4504)
For the Firm

SERVICE LIST

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